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| TITLE: ENVIRONMENTAL MANAGEMENT | | |
| COGNIZANT SENIOR MANAGER: | APPROVED BY: | |
| Approval on File 3/19/04 D. T. Bignell Date Permitting & Compliance | Approval on File S. D. Warren General Manager | 3/22/04 Date |

1.0 POLICY

Washington TRU Solutions LLC (WTS) is committed to achieving and maintaining high standards of environmental quality and to providing a safe and healthful workplace for its employees, contractors, and communities. The WTS mission is to dispose of transuranic waste in an environmentally-sound and safe manner while meeting the mandate to reduce costs. Concern for environmental aspects related to the mission is vital to accomplishing that mission.

WTS will maintain the Waste Isolation Pilot Plant (WIPP) facilities, and will conduct WIPP operations in compliance with applicable federal and state laws and regulations, U.S. Department of Energy (DOE) Orders, and other applicable requirements pertaining to the environment, and the health and safety of its employees and the general public. WTS will design, construct, and maintain any new facilities in accordance with the above requirements. These activities are accomplished, in part, through implementation of an Environmental Management System (EMS) that meets applicable DOE Orders and specifications of the International Organization for Standardization, ISO 14001 Standard, *Environmental Management Systems—Specification with Guidance for Use* (ISO, 1996).

WTS is committed to the continual improvement of its environmental performance, including the prevention of pollution through the implementation of an EMS that incorporates the core functions of the Integrated Safety Management System (ISMS). WTS will strive to be a leader in reducing, reusing, and recycling, and will manage wastes in a safe, environmentally-sound, and compliant manner.

WTS implements and maintains a Pollution Prevention Program plan that identifies annual goals to reduce the generation of hazardous and sanitary wastes, especially through recycling and elimination of hazardous materials. This plan also identifies opportunities for pollution prevention and addresses the acquisition of environmentally-preferable products and services through an affirmative procurement plan.

WTS will work with stakeholders to develop programs that provide safeguards for the community, the workplace, and the environment, while providing flexibility to meet the needs of our business. WTS emphasizes individual responsibility for employees and management to report potential hazards and compliance issues, and to be involved in protecting the environment.

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This policy will be communicated to all employees and made available to the public via the WIPP Internet and at the WIPP Information Center.

2.0 RESPONSIBILITIES

2.1 General Manager

- Issuing the WTS mission statement and environmental management policy.
- Reviewing and approving appropriate environmental aspects and impacts from which the WIPP site objectives and targets are developed.
- Reviewing the EMS for adequacy and suitability to support the site's mission.
- Appointing a specific management representative who has the responsibility and authority for ensuring that the EMS requirements are established, implemented and maintained, and for reporting on the performance of the EMS.

2.2 Managers

- Ensuring that employees at each level are aware of the environmental impacts their work activities may have and the potential environmental consequences for departure from specific operating procedures.
- Ensuring that personnel performing tasks that have the potential to cause significant environmental impacts are competent on the basis of appropriate education, training, and/or experience.
- Ensuring that personnel receive initial and refresher training as required, including General Employee Training (GET) and GET refresher, which contain information necessary for the general employee to comply with this policy.
- Ensuring that environmental aspects with significant impacts (actual or potential) are considered during each fiscal year's budget planning process.
- Requesting adequate resources to ensure compliance with this policy.

2.3 Employees

To the extent of their job scope:

Being aware of their roles and responsibilities in achieving conformance with this
policy and those procedures dealing with environmental compliance, including
emergency preparedness and response.

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- Being aware of the potential environmental consequences of departure from specified operating procedures.
- Completing and maintaining the qualifications of their assigned work scope.
- Attending initial and refresher training, including GET and GET refresher training, to assure up-to-date knowledge necessary to comply with this policy.

2.4 Site Environmental Compliance

- Maintaining the EMS description document consistent with DOE O 450.1,
 Environmental Protection Program; ISO 14001; and this policy. The document
 will describe additional responsibilities and provide instructions on accomplishing
 those responsibilities and the responsibilities within this policy.
- Performing environmental assessments, surveillances, and walkdowns to evaluate compliance with this policy and the EMS description document.
- Providing WTS Management with the EMS Annual Report for review which includes an evaluation of environmental assessments and trends, recommendations regarding the adequacy of this policy, and revisions to environmental aspects and impacts of WIPP operations.
- Supporting interface with environmental stakeholders.
- Maintaining the WIPP Pollution Prevention Program Plan and conducting Pollution Prevention Opportunity Assessments (PPOAs).
- Coordinating environmental regulation impact reviews and communicating requirements to WIPP organizations impacted by new and proposed regulations.
- Assisting WIPP organizations in the development and implementation of environmental compliance programs and procedures.
- Identifying and reporting environmental compliance issues or potential issues to WTS senior management, including the WTS General Counsel, as appropriate.

2.5 Human Resources (Technical Training)

Technical Training shall perform training necessary to comply with this policy, including providing environmental management and pollution prevention training as specified by the Manager of Permitting and Compliance.

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3.0 REFERENCES

DOE O 450.1, Environmental Protection Program

ISO 14001 Standard, Environmental Management Systems—Specification with Guidance for Use (ISO, 1996).